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**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

Tatyana Silva, ) Case No: 3:23-cv-00556-ART-CLB  
vs. )  
Plaintiff, ) **ORDER GRANTING**  
 ) **STIPULATION RE: PROTOCOL**  
 ) **RE: ANONYMOUS WITNESSES**  
Panasonic Corporation of North )  
America, Inc., d/b/a/ Panasonic Energy )  
Corporation of North America, Inc., a )  
Delaware corporation; and DOES 1-10, )  
Defendants. )

IT IS HEREBY STIPULATED AND AGREED by the parties' counsel of record as follows regarding the Employee 1 – Employee 7 (collectively, the “Anonymous Witnesses”) referenced in Plaintiff’s Complaint (ECF No. 1).

1. Within five days of the entry of an order relating to this Stipulation and Order, Plaintiff will disclose the names and contact information (street address, email address and telephone numbers) for the Anonymous Witnesses to allow Defendant an opportunity to investigate factual matters relating to the Anonymous Witnesses and potentially depose them in the future.

1       2. Defendant agrees that the true names of the Anonymous Witnesses will  
2 not be disclosed in public filings without the permission of the Anonymous Witness in  
3 question, or as may be permitted by further order of the Court.

4       3. With respect to any of the Anonymous Witnesses who are still employed  
5 by Defendant, unless otherwise agreed or as permitted by further order of the Court, the  
6 disclosure of the fact that they are one of the Anonymous Witnesses named in the  
7 Complaint will be limited within the Panasonic organization to: (a) personnel within the  
8 Panasonic Legal Department; (b) Office of Ethics and Compliance Investigators (who  
9 may conduct witness interviews); and (c) any other person within the organization who  
10 is a decision-maker in this case with respect to litigation strategy or settlement  
11 authority.

12       4. If any dispute or issue arises regarding the protocols set forth in this  
13 Stipulation and Order, the parties will proceed as outlined in Paragraph V B of Judge  
14 Baldwin's Civil Standing Order (ECF No. 9).

15       MCCRACKEN, STEMERMAN &  
16       HOLSBERY, LLP

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25       IT IS SO ORDERED:

26         
27       UNITED STATES MAGISTRATE JUDGE

28       Dated: February 1, 2024